



April 8, 2022

Robin Huntley, Senior Housing Policy Specialist  
State of California  
Department of Housing and Community Development  
2020 West El Camino Boulevard, Suite 500  
Sacramento, CA 95833

*via email:* robin.huntley@hcd.ca.gov

**RE: Proposed Amendments to City of Eureka Housing Element**

Ms. Huntley:

As you are aware, the City of Eureka has recently proposed amendments to its certified 2019-2027 Housing Element. As the Department of Housing and Community Development (HCD) reviews these proposed amendments, we submit the following comments for your consideration.

Our top priority for any Housing Element is to ensure the maximum production of new homes—particularly affordable homes—in areas that are walkable, bikeable and well served by public transit. In Eureka, this largely means the downtown area. This part of the city has the highest National Walkability Index score,<sup>1</sup> the highest Walk Score,<sup>2</sup> the best access to high-quality transit locations,<sup>3</sup> the highest employment density,<sup>4</sup> and the greatest concentration of both public and private services. It is the part of the city best served by public transit through a combination of the local Eureka Transit System, the regional Redwood Transit System, and

<sup>1</sup> United States Environmental Protection Agency. 2021. National Walkability Index.

<https://www.epa.gov/smartgrowth/smart-location-mapping#walkability>.

<sup>2</sup> Walkscore.com. No date. <https://www.walkscore.com/CA/Eureka>.

<sup>3</sup> UCLA Center for Neighborhood Knowledge and California Air Resources Board. 2022. Transportation Disparities Mapping Tool. <https://experience.arcgis.com/template/9c13f35df3904dcb80530d0df49bdf9e/page/Accessibility/>.

<sup>4</sup> City of Eureka. 2018. 2040 General Plan, Figure 2-6.

[http://eureka2040gpu.com/Links/pdfs/Eureka%20General%20Plan%20May2018%20Final%20\(web\).pdf](http://eureka2040gpu.com/Links/pdfs/Eureka%20General%20Plan%20May2018%20Final%20(web).pdf).

long-distance services including Amtrak and Greyhound. Therefore, we urge the prioritization of dense housing development in and around the downtown area of Eureka.

Our reasons for prioritizing dense housing development in this area include the following:

- **Affordability.** While official housing affordability measures do not include the cost of transportation, this cost can be very high. In Eureka, households spend comparable amounts on housing and transportation (slightly less than 1/3 of household income spent in each category). However, households in the downtown area spend a lower proportion of their income on transportation, presumably due to easier non-vehicular access to key destinations.<sup>5</sup>
- **Access.** The density of jobs, services, retail and transit in the downtown area ensures better access to key destinations for residents of this area, particularly for those who do not or cannot operate a vehicle due to age, disability, or cost.
- **Health and Safety.** Studies consistently show that active transportation results in significant health benefits. This is true even when the costs of increased collision risks and increased exposure to pollution are considered.<sup>6</sup> Providing housing in areas where active transportation is easily accessible is therefore important for improving public health and quality of life. An important caveat is that the City of Eureka is consistently ranked among the most dangerous in the state for people walking, biking and driving.<sup>7</sup> While the risks of walking and biking are outweighed by the benefits from a public health perspective, the level of risk is nevertheless unacceptable. Therefore, new housing development should be coupled with transportation infrastructure safety improvements.
- **Climate and Environment.** The California Air Resources Board (CARB) recognizes that a substantial reduction in per capita miles driven will be required in order to meet the state's climate targets.<sup>8</sup> AB 185 (2019-Grayson) further recognized the key connections among the state's housing, transportation and environmental goals by directing HCD to hold regular joint coordination meetings with the California Air Resources Board and the California Transportation Commission. The importance of locating new housing in locations with access to low-carbon, sustainable transportation options is well-recognized by the state.

The certified Housing Element took significant steps toward ensuring this kind of housing development, particularly through Implementation Measure Imp H-34. The City's proposed amendments largely target Imp H-34. We express the following specific concerns:

- a. The proposed amendments remove several prime downtown sites from Imp H-34. Some of these would be removed as a result of the "land swap" proposed with a local

---

<sup>5</sup> Center for Neighborhood Technology. No date. H+T Index. <https://htaindex.cnt.org/map/>.

<sup>6</sup> Mueller, Natalie et al. 2015. Health Impact Assessment of Active Transportation: A Systematic Review. *Preventive Medicine* 76: 103-114.

<sup>7</sup> California Office of Traffic Safety. Various dates. Crash Rankings. <https://www.ots.ca.gov/media-and-research/crash-rankings/>

<sup>8</sup> CARB. 2019. 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals. [https://ww2.arb.ca.gov/sites/default/files/2019-01/2017\\_sp\\_vmt\\_reductions\\_jan19.pdf](https://ww2.arb.ca.gov/sites/default/files/2019-01/2017_sp_vmt_reductions_jan19.pdf).

developer, while no justification at all is offered for the removal of at least one site (“Site 4”). In its March 1, 2022 submission letter to HCD accompanying the proposed Housing Element amendments, the City stated that these changes are a result of community concerns about road safety and loss of parking (see below). However, the City failed to mention that (a) the proposed new “Sunset Heights” parcels resulting from the land swap are located on Broadway, a corridor which has an even greater concentration of fatal and severe injury collisions than the 4<sup>th</sup> and 5<sup>th</sup> Street corridor downtown; and (b) the City is currently conducting its own Downtown Parking Study which belies purported parking concerns by showing clearly that existing parking is underutilized.<sup>9</sup> There is thus no reasonable justification for removing these prime downtown sites from Imp H-34.

- b. The proposed amendments would reduce the total number of deed-restricted affordable housing units produced from 315 to 302. Any reduction in planned affordable housing production works against both local and state goals.
- c. The proposed amendments to Technical Appendix Table 42 show increased maximum floor area ratios and building heights for many parcels in the R2 and R3 zones. While we are supportive of such increases in allowable density, the City has not yet to our knowledge either proposed or adopted amendments to the zoning code to effectuate these changes.

The City represented to HCD in its March 1, 2022 letter that these amendments are a response to community opposition to the original plan expressed in public meetings in early 2021. However, the City neglected to mention that these meetings were dominated by a small number of business owners and their employees—some of whom seem to have been paid to be there. The City is well aware that in addition to some opposition, there is also significant community support for the development of downtown housing of the kind proposed in the currently adopted Imp H-34. But the City has made no effort to systematically assess public opinion before using it as an argument for removing several prime downtown sites from the Housing Element.

The City has proposed some amendments which we support, notably the addition of “Site F” and “Site G”—City-owned parking lots at 3<sup>rd</sup> & G Streets, 3<sup>rd</sup> & H Streets, and 1<sup>st</sup> & C-F Streets—to Imp H-34. Site F has already been the subject of some controversy related to the removal of parking, but the City rightly continues to pursue it. The City should similarly continue to pursue housing development at the other downtown sites—Sites 4, 5, 6, 7, 9 and 10—and not remove any of them from the Housing Element. We also support the addition of the “Sunset Heights” parcels to Imp H-34, but only in addition to the downtown sites, not as replacements for them.

In sum, we urge HCD to hold the City of Eureka to its previous promises to produce affordable housing in the walkable, bikeable, transit-oriented downtown area, and not to allow any amendments to the Housing Element to weaken this commitment.

Thank you for your consideration.

---

<sup>9</sup> [https://www.ci.eureka.ca.gov/depts/pw/engineering/parking\\_study.asp](https://www.ci.eureka.ca.gov/depts/pw/engineering/parking_study.asp)

Sincerely,

Colin Fiske, Executive Director  
Coalition for Responsible Transportation Priorities  
145 G Street, Suite A  
Arcata, CA 95521  
colin@transportationpriorities.org

Caroline Griffith, Executive Director  
Northcoast Environmental Center  
PO Box 4259  
Arcata, CA 95518  
director@yournec.org

Nezzie Wade, President  
Affordable Homeless Housing Alternatives  
PO Box 3794  
Eureka, CA 95502  
now1@suddenlink.net

Jennifer Kalt, Director  
Humboldt Baykeeper  
600 F Street, Suite 3 #810  
Arcata, CA 95521  
jkalt@humbolddbaykeeper.org

Daniel Chandler, PhD, Steering Committee Member  
350 Humboldt  
PO Box 231  
Bayside, CA 95524  
dwchandler@gmail.com

Matthew Simmons, Co-Director  
Redwood Coalition for Climate and Environmental Responsibility  
matthewsimmons42@gmail.com